

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**ANGEL DAVID MORALES  
VALLELLANES,  
Plaintiff,**

**v.**

**JOHN POTTER, UNITED STATES  
POSTMASTER GENERAL, ET. ALS.,  
Defendants.**

**CIVIL NO. 97-2459 (JAG)**

**DAMAGES BASED ON  
RETALIATION AND  
DISCRIMINATION; PROHIBITED  
PERSONNEL PRACTICES;  
UNFAIR LABOR PRACTICES;  
BREACH OF COLLECTIVE  
BARGAINING AGREEMENT**

**TRIAL BY JURY IS HEREBY  
REQUESTED**

**INFORMATIVE MOTION**

**TO THE HONORABLE COURT:**

**COMES NOW**, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court that depositions of the followings defendants witnesses will be taken at our Offices at 22 Mayagüez Street, Hato Rey, Puerto Rico:

1. Carmen Rosa: beginning April 14, 2004 from 9:00 a.m. continuing from day to day until its completion
2. Frank Girau: April 16, 2004 from 9:00 a.m. to 12:00 p.m.
3. Inspector Ron Baraga: April 16, 2004 from 2:00 p.m. to 5:00 p.m.
4. William Morales: April 19, 2004 from 9:00 a.m. to 12:00 p.m.
5. Eliezer Baez: April 19, 2004 from 2:00 p.m. to 5:00 p.m.
6. Cándido López: April 26, 2004 from 2:00 p.m. to 5:00 p.m.
7. Antonio López: May 4, 2004 from 9:00 a.m. to 12:00 p.m.
8. José Padró: May 4, 2004 from 2:00 p.m. to 5:00 p.m.
9. Rafael Gomila: May 6, 2004 from 9:00 a.m. to 12:00 p.m.

10. Virginia Matías: May 10, 2004 from 9:00 a.m. to 5:00 p.m.
11. John Malavé: beginning May 12, 2004 from 9:00 a.m. and continuing from day to day until its completion
12. Enrique López: beginning May 14, 2004 from 9:00 a.m. and continuing from day to day until its completion
13. Pedro Reyes: May 18, 2004 from 9:00 a.m. to 12:00 p.m.
14. José Sepúlveda: May 20, 2004 9:00 a.m. to 5:00 p.m.

**WHEREFORE**, it is respectfully requested from this Honorable Court to take notice of the above and schedule a status conference.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that on April 6, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

S/MIGUEL E. MIRANDA-GUTIERREZ  
**MIGUEL E. MIRANDA-GUTIERREZ,ESQ.**  
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